

December 16, 2011

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC-Docket 02-6

Dear Ms. Dortch:

On December 16, 2011 the following representatives spoke via telephone conference with James Bachtell, Attorney Advisor; Cara Voth, Attorney Advisor and; Alec McDonell, Telecommunications System Specialist to the FCC regarding Oakland Unified School District's ("OUSD") desire to obtain a waiver of the Commission's rules regarding after hours and offsite use of Internet Access funded in part by the Schools and Libraries Support Mechanism ("E-Rate").

Gee Kin Chou, Information Technology Officer, Oakland Unified School District
Paul Hoy, Director of Enterprise Network Services, Oakland Unified School District
Kim Friends, Vice-President of E-Rate Compliance, CSM Consulting, Inc.
Michelle Harken, Director of Pre-Commitment Operations, CSM Consulting, Inc.

The discussion focused primarily around OUSD's strategic plan that includes a "Community Schools" model whereby the District fosters the idea that it takes a whole community to teach a child. Parents, family, community members, teachers and administrators ALL play an integral part in the success of each student and this often happens outside of the classroom walls. This idea been embraced by the community at large, and technology can be the glue that binds all the parties together, but the economic and demographic challenges that Oakland face make implementation a near impossibility. More than 25,000 of OUSD's 38,000+ students qualify for FREE lunch under the guidelines of the National School Lunch Program so for the most part, internet access at home is a luxury that most families simply cannot afford.

Current E-Rate rules do not allow access to the internet from an ineligible location; such as a student's home or just about anywhere other than school grounds. OUSD is seeking a waiver of the Commission's rules to allow a directional bleed over of the Internet Access signal that is funded in part by the E-Rate program in a handful of already identified schools. This would be achieved by utilizing WLAN infrastructure and existing bandwidth that is essentially goes unused after hours. There would be no monetary impact to the E-Rate fund as a whole; but the impact this arrangement would leave on the students of OUSD would be immeasurable.

The schools that have been pre-selected by OUSD for this potential pilot were carefully chosen for several reasons:

- Adjacent to low income neighborhoods
- Teachers are professionally ready and eager to fully integrate technology in their day to day curriculum
- Students are in grades 6-8 which has been shown to be an age where technology can make a huge difference in their level of engagement and enthusiasm to learn

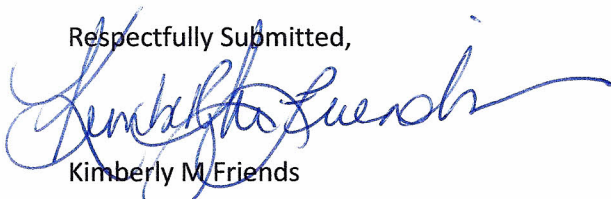
Though OUSD is a large, urban school district, this pilot would be controlled and measured to allow for meaningful data collection that would be shared with the Commission in order to demonstrate how a waiver of this kind could enhance the educational experience for so many at risk students.

Technical details regarding the proposed solution have been considered as well.

- The 'signal' OUSD is talking about transmitting would only go approximately one city block (200-400 feet)
- Students and parents would sign an Acceptable Use Policy ("AUP") indicating their understanding that the 'at home' use would be primarily for educational purposes
- The encrypted login would route all internet traffic on the devices through OUSD's CIPA compliant filter and firewall
- OUSD, in conjunction with OTX West (www.otxwest.org) has a mechanism to ensure all students have access to computers for little or no cost

OUSD appreciates the Commission's willingness to explore this option and is happy to discuss any additional concerns or questions that may arise.

Respectfully Submitted,



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